

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

LORDSTOWN MOTORS CORP., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

**SUPPLEMENTAL DECLARATION IN SUPPORT OF RETENTION OF
FOLEY & LARDNER LLP AS PROFESSIONAL UTILIZED IN ORDINARY
COURSE OF BUSINESS**

I, JONATHAN E. MOSKIN, pursuant to 28 U.S.C. § 1746, hereby declare the following is true to the best of my knowledge, information, and belief:

1. I am a partner of the law firm of Foley & Lardner LLP, located at 90 Park Avenue, New York, NY 10016 (the “Firm”), which has been retained by one or more of the debtors or debtors in possession (collectively, the “**Debtors**”), in the above captioned Chapter 11 Cases, in the ordinary course of the Debtors’ businesses. The Debtors wish to retain the Firm to continue providing ordinary course services during the Chapter 11 Cases, and the Firm has consented to provide such services. This Declaration is submitted in compliance with the Order (A) Authorizing Retention and Payment of Professionals Utilized in the Ordinary Course of Business and (B) Granting Other Related Relief (the “**Ordinary Course Professionals Order**”). I have reviewed the Ordinary Course Professionals Order, and I understand the limitations on compensation and reimbursement under such order.

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

2. On August 14, 2023, I executed the Declaration in Support of Retention of Foley & Lardner LLP as Professional Utilized in Ordinary Course of Business (the “Original Declaration”).

3. In Paragraph 3 of the Original Declaration, it stated that at that time “the Firm may have performed services in the past two (2) years, may currently perform services, and may perform services in the future in matters unrelated to the Chapter 11 Cases for persons that are parties in interest in the Chapter 11 Cases,” and identified several current and former clients. Included among those entities were the following two clients:

Party	Former Client	Current Client	Not a Client	Notes
SA Automotive LTD		x		
Superior Cam Inc. ²		x		

4. Since filing the Original Declaration, I have learned that other Firm partners have been requested to represent the clients listed above in Paragraph 3 (the “Other Clients”) in connection with their interests as unsecured creditors in the Chapter 11 cases, including the filing of proofs of claims.

5. The Firm believes that these described representations of the Other Clients in the Chapter 11 cases are consistent with the Advance Waiver and the limited role of Foley as ordinary course counsel for a specific type of legal services. No Firm attorney working for the Debtor in the ordinary course counsel role has worked on, works on, or will work the matters being serviced by Firm attorneys for the Other Clients and vice versa.

6. Pursuant to Paragraph 15 of the Original Declaration, we are supplementing the information provided in my Original Declaration.

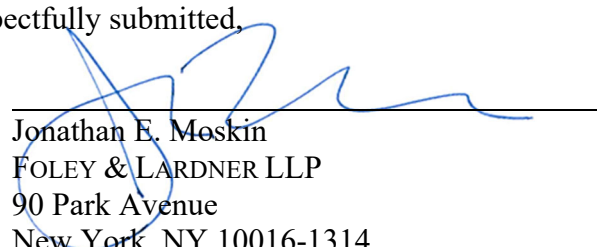
² Superior Cam, Inc. is an affiliate of Diversified Tooling Company, which also is a Firm client.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 20, 2023
New York, New York

Respectfully submitted,

By:



Jonathan E. Moskin
FOLEY & LARDNER LLP
90 Park Avenue
New York, NY 10016-1314
Telephone: (212) 682-7474
Facsimile: (212) 687-2329
E-mails: <moskin@foley.com>